

1 SHAWN N. ANDERSON
United States Attorney
2 ASHLEY L. KOST
Assistant United States Attorney
3 P.O. Box 500377
United States Courthouse, Second Floor
4 Saipan, MP 96950
TEL: (670) 236-2980
5 FAX: (670) 236-2985
6 Attorneys for the United States of America

FILED
Clerk
District Court

FEB 27 2024

for the Northern Mariana Islands
By af
(Deputy Clerk)

7 **IN THE UNITED STATES DISTRICT COURT**
8 **FOR THE NORTHERN MARIANA ISLANDS**

9 **UNITED STATES OF AMERICA,**

10 Plaintiff,

11 vs.

12 **HONGJIANG YANG,**

13 Defendants.
14

Criminal Case No. **CR 24-00010**

INDICTMENT

Count One:

Conspiracy to Transport Illegal Aliens
8 U.S.C. §§ 1324(a)(1)(A)(ii) and (v)(I)

15
16 THE GRAND JURY CHARGES THAT:

17 **The Scheme**

18 Beginning on or about July 9, 2023, HONGJIANG YANG (Defendant) and others
19 orchestrated a plan to transport Defendant and eight other Chinese nationals from the District of
20 the Northern Mariana Islands to the Territory of Guam, with the intent to unlawfully enter and
21 reside in Guam, knowing and in reckless disregard of the fact that Defendant and the eight other
22 Chinese nationals had no right or authority to enter Guam, and Defendant and seven of the other
23 Chinese nationals were illegally present in the United States. In furtherance of the plan,
Defendant and the eight other Chinese nationals hired, and thereby conspired with four

INDICTMENT- 1

1 previously-indicted United States citizens. Defendant, the other Chinese nationals, and two of
2 the U.S. citizens boarded a small motorboat leaving from Smiling Cove Marina, Saipan, CNMI
3 with the intent of transporting the Chinese nationals to the Territory of Guam on or about July 9,
4 2023, in furtherance of a violation of law. The boat departed Smiling Cove Marina at
5 approximately 9:00 PM and proceeded south toward the Territory of Guam. On or about July
6 10, 2023, the boat ran out of fuel and began to drift just before it reached the island of Rota, thus
7 necessitating a rescue operation by the United States Coast Guard.

8 **Count One: Conspiracy to Transport Illegal Aliens**
9 8 U.S.C. §§ 1324(a)(1)(A)(ii) and (v)(I)

10 On or about July 9, 2023, in the District of the Northern Mariana Islands, Defendant
11 HONGJIANG YANG combined, conspired, confederated, and agreed with others, known and
12 unknown to the Grand Jury, to violate 8 U.S.C. § 1324(a)(1)(A)(v)(I), specifically, conspiracy to
13 transport illegal aliens in violation of 8 U.S.C. § 1324(a)(1)(A)(ii), to wit, by agreeing to
14 transport Defendant and eight other aliens, specifically:

- 15 1. Li, Xiaohua;
- 16 2. Dong, ChangCai;
- 17 3. Weng, MeiFang;
- 18 4. Huang, Xiulan;
- 19 5. Wu, Yingchun;
- 20 6. Gao, Kun;
- 21 7. Tang, YongBing; and
- 22 8. Li, Kun;

23 knowing and in reckless disregard that said aliens were in the United States in violation of law
and were not authorized to enter the Territory of Guam, in furtherance of such violation of law,

1 all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii) and (v)(I).

2
3 Dated this 27th day of February 2024.

4 A TRUE BILL.

5 Signature of foreperson has been
6 **REDACTED** pursuant to the Privacy Policy of the
7 Judicial Conference of the United States.

8 SHAWN N. ANDERSON
9 United States Attorney

10 By:

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12 ASHLEY L. KOST

13 Assistant United States Attorney
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